

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DR. MANHUA MANDY LIN,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civ. No. 02-3612
	:	
ROHM AND HAAS COMPANY,	:	
	:	
Defendant.	:	

DEFENDANT'S OBJECTIONS TO UNSEALING OF DOCUMENTS

Pursuant to Rule 5.1.5 of the Local Rules of Civil Procedure and in response to the Court's November 9, 2006 Notice (with the response time extended by Court Order of December 22, 2006), Defendant Rohm and Haas Company objects to the unsealing of the following documents on the ground that these documents contain confidential trade secret information:

1. Paper No. 38 (filed on September 23, 2003) -- Memorandum of Law filed by Plaintiff In Opposition to Defendant's Motion for Summary Judgment and accompanying Appendix of Exhibits;
2. Paper No. 40 (filed on October 10, 2003) -- Reply Brief filed by Defendant Rohm and Haas Company in support of its Motion for Summary Judgment and accompanying exhibits;
3. Paper No. 42 (filed On November 25, 2003) -- Document filed under seal by Defendant Rohm and Haas Company: Defendant's Motion for Reconsideration or in the Alternative, Renewed Motion for Summary Judgment and exhibits thereto;
4. Paper No. 45 (filed on December 9, 2003) -- Plaintiff's Memorandum of Law In Opposition to Defendant's Motion for Reconsideration or In the Alternative, Renewed Motion for Summary Judgment and exhibits thereto; and

5. Paper No. 52 (filed on February 9, 2004) -- Plaintiff's Motion For Reconsideration of the Order Granting Summary Judgment as to Counts II and III of Amended Complaint and exhibits thereto.

Defendant respectfully requests that the Court continue to maintain these documents under seal because they contain confidential information.

Respectfully submitted,

/s/ Raymond A. Kresge rak1654

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on this 16th day of February 2007, I caused to be served a true and correct copy of Defendant's Objections to Unsealing of Documents by first-class mail, postage prepaid, and electronic filing upon:

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